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11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF WASHINGTON

13 RAMON TORRES HERNANDEZ, and
FAMILIAS UNIDAS POR LA JUSTICIA,
14 AFL-CIO, a labor organization;

15 Plaintiffs,
16 vs.

17 UNITED STATES DEPARTMENT OF
LABOR and MARTIN WALSH, in his
18 official capacity as United States Secretary
of Labor,

19 and

20 WASHINGTON STATE EMPLOYMENT
21 SECURITY DEPARTMENT and CAMI
22 FEEK, in her official capacity as
Commissioner,

23 Defendants.

No. 1:20-CV-03241-SMJ

PARTIES' JOINT MOTION TO
EXPEDITE MOTION FOR
ENTRY OF MODIFIED ORDER

Noting date: December 1, 2021,
6:30 p.m.
Without Oral Argument

PARTIES' JOINT MOTION TO EXPEDITE
MOTION FOR ENTRY OF MODIFIED ORDER- 1

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1 Pursuant to LCivR 7(i)(2)(C), all parties move for expedited consideration of
2 their joint motion for entry of modified order. There is good cause for this relief,
3 and all parties consent to the underlying motion and its expedited consideration.
4

5 An expedited hearing on the motion for entry of modified order is necessary
6 to prevent delay that could harm the interests of all parties and the public. If
7 granted, the modified order proposed by the parties would require Defendants
8 “promptly” publish the results of their 2020 Agricultural Peak Employment Wage
9 and Practice Employer Survey as well as begin administering their 2021 employer
10 survey before the end of the year. Delaying review of the joint motion would
11 impose substantial administrative burden on the Defendants and could impact the
12 response rates for the 2021 survey. The concern for the response rate caused the
13 parties to agree that ESD should begin the survey process on Monday, November
14 29, 2021.
15

16 The Court granted the parties’ joint motion to file under seal today, [ECF No.](#)
17 [99](#), and the clerk’s office filed the motion under seal, [ECF No. 100](#). The parties left
18 the noting date on that motion blank because they were uncertain when the Court
19 would consider the motion to seal.
20

21 The parties request that the Court consider their joint motion for entry of
22 modified order within 7 days of the date that motion is filed.
23

1 DATED this 1st day of December, 2021.

2 *Attorneys for Plaintiffs*

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